

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

**UNITED STATES OF AMERICA**

**vs.**

**RUSSELL LUCIUS LAFFITTE**

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CRIMINAL NO. 9:22-658-RMG

**GOVERNMENT’S REQUEST FOR AN EXTENSION OF TIME**

COMES NOW the United States of America, by and through its undersigned counsel, and petitions this Honorable Court for an extension of time to file a response to the Defendant Russell Lucius Laffitte’s (“Defendant”) memorandum regarding the applicability of Federal Rule of Evidence 606 to the proposed affidavits and Supplemental Motion for a New Trial. On December 20, 2022, the Defendant requested to file two juror affidavits under seal. On December 21, 2022, the Court ordered the Defendant to submit a memorandum of law which addresses the applicability of Rule 606(b) of the Federal Rules of Evidence and related caselaw regarding the two juror affidavits. The Defendant requested to file a third juror affidavit on December 27, 2022. The Court granted the Defendant’s request for an extension of time, and the Defendant filed a memorandum on December 28, 2022. The Court ordered the Government to respond five days after the Defendant filed his memorandum.

Thereafter, the Defendant retained new counsel. On January 1, 2023, the Defendant’s new counsel filed a Notice of Appearance and a Supplemental Motion for a New Trial. In his Supplemental Motion, the Defendant raises new arguments not previously briefed by the parties. The Government requests an additional fourteen days to respond to the Defendant’s briefs regarding the applicability of Rule 606 and the Supplemental Motion for a New Trial.

The Government has consulted with the Defendant's new counsel, Mark Moore, and he consents to the Government's requests for an extension of time.

Respectfully submitted,

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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